

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 0:22-CV-61553-DIMITROULEAS/HUNT

CRUZ VALDIVIESO FIGUERA,

Plaintiff,

vs.

ALL VIP CARE INC. AND  
LIZ VELAZQUEZ MCKINNON,

Defendants.

**VERDICT FORM**

**Do you find from a preponderance of the evidence:**

1. That Cruz Valdivieso Figuera was an employee of All VIP Care, Inc.?

Answer "YES" or "NO" No

*If you answered "YES," please answer the next question.*

*If you answered "NO," you are done. Please sign and date the verdict form.*

2. That Liz Velazquez McKinnon exerted sufficient control over significant aspects of All VIP Care, Inc.'s day-to-day functions such that she is individually liable for violations of the FLSA?

Answer "YES" or "NO" \_\_\_\_\_

*Please answer the next question.*

3. That Cruz Valdivieso Figuera was not paid minimum wages, as required by law?

Answer "YES" or "NO" \_\_\_\_\_

*If you answered "YES," please answer the next question.*

*If you answered "NO," please skip Questions 4-5 and proceed to Question 6.*

4. That Cruz Valdivieso Figuera should be awarded damages for her minimum wage claim?

Answer "YES" or "NO" \_\_\_\_\_

If your is "YES," in what amount? \$ \_\_\_\_\_

*If you answered "YES," please answer the next question.*

*If you answered "NO," please skip Question 5 and proceed to Question 6.*

5. That Defendants have shown that the act or omission giving rise to the failure to pay minimum wages was in good faith and that they had reasonable grounds for believing that their act or omission was not in violation of the FLSA?

Answer "YES" or "NO" \_\_\_\_\_

*Please answer the next question.*

6. That Cruz Valdivieso Figuera was not paid overtime wages for time worked over 40 hours in a workweek, as required by law?

Answer "YES" or "NO" \_\_\_\_\_

*If you answered "YES," please answer the next question.*

*If you answered "NO," you are done. Please sign and date the verdict form.*

7. That Cruz Valdivieso Figuera should be awarded damages for her overtime wage claim?

Answer "YES" or "NO" \_\_\_\_\_

If your is "YES," in what amount? \$ \_\_\_\_\_

*If you answered "YES," please answer the next question.*

*If you answered "NO," you are done. Please sign and date the verdict form.*

8. That Defendants have shown that the act or omission giving rise to the failure to pay overtime wages was in good faith and that they had reasonable grounds for believing that their act or omission was not in violation of the FLSA?

Answer "YES" or "NO" \_\_\_\_\_

*Please answer the next question.*

SO SAY WE ALL.